

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

ROBBIE BURKE, as the Special	)	
Administrator of the Estate of Elliot Earl	)	
Williams, Deceased,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. 4:11-CV-720-JED-PJC
VIC REGALADO, SHERIFF OF TULSA	)	
COUNTY, in His Official	)	
Capacities, <i>et al.</i> ,	)	
	)	
Defendant.	)	

**JOINT MOTION TO ENTER JUDGEMENT**

Plaintiff and Defendants, through their undersigned counsel, hereby advise the Court that this matter has been settled by way of an Agreed Judgment on all claims of the Plaintiff, *Robbie Burke, as the Special Administratrix of the Estate of Elliot Earl Williams, deceased, against Vic Regalado, Sheriff of Tulsa County, in his official capacity*, Case No. 4:11-CV-720.

To effectuate the settlement between all parties, Plaintiff has agreed to release and discharge the judgments previously entered by the court in this matter on March 22, 2017 and August 29, 2017. Dkt. Nos. 499 and 548. Plaintiff further waives all claims to prejudgment and/or post-judgment interest on each of the prior respective judgments, Dkt. Nos. 499 and 548, attorney fees and costs.

*In lieu* of any and all claims for money damages, pre or post judgment interest, attorney fees and costs in whatever form or however denominated which arise from or may have arisen from the instant litigation, Plaintiff and Defendant, Vic Regalado, in his official capacity as the Tulsa County Sheriff, have agreed to enter the Agreed Judgment submitted herewith in the amount of Ten Million Dollars and no Cents (\$10,000,000.00), as the sole payment of money damages

which were or may have been awarded in this matter inclusive of any and all prejudgment interest; attorney fees, cost and expenses both pre-appeal and post-appeal; and said principal amount of this Agreed Judgment to bear post-judgment interest at the rate of 4.75% per annum.

To effectuate their agreement and settlement, Plaintiff and Defendant respectfully request this Court to execute the Agreed Judgment submitted herewith in favor of Plaintiff, *Robbie Burke, as the Special Administratrix of the Estate of Elliot Earl Williams, deceased, against Vic Regalado, Sheriff of Tulsa County, in his official capacity*, Case No. 4:11-CV-720 in the amount of Ten Million Dollars and no Cents (\$10,000,000.00), to bear post-judgment interest at the rate of 4.75% per annum.

This compromise, settlement and resulting Judgment are intended to fully resolve all claims.

Respectfully Submitted,

/s/ Robert M. Blakemore

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**CERTIFICATE OF SERVICE**

This is to certify that on the November 27, 2019, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants entered in this case.

/s/Robert M. Blakemore